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January 26, 2015

Honorable Judge Gregory H. Woods, U.S.D.J.
Chambers of the United States District Court for the Southern District
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

Re: Negri v. Friedman, et al.
Index No.: 14 CV 10233

Dear Honorable Judge Woods:

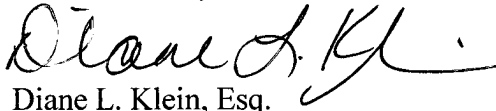
Pursuant to Your Honor's Court Rules, please accept this letter as a request for a pre-Motion Conference. This office represents Defendant P. J. Louis in the above-referenced matter and Defendant intends to file a pre-Answer Motion to Dismiss the Complaint pursuant to Fed. R. Civ. P. 12(b)(6) for failure to state a cause of action and pursuant to Fed. R. Civ. P. 12(b)(7) for failure to join a necessary party.

I have spoken with Plaintiff's counsel and they consent to the making of this Motion, although, obviously, they do not consent to the relief sought.

It is our understanding that Your Honor will advise of the date and time for the pre-Motion conference and that same may be conducted telephonically. We look forward to hearing from you regarding this matter.

Very truly yours,

Jasne & Florio, L.L.P.



Diane L. Klein, Esq.

/dlk

cc: Joanna Sandolo, Esq.
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Via eMail